REMARKS

By this amendment, claims 1-17, 19-22, 25-28, 30-33, 36, and 37 are pending, in which claims 18, 23, 24, 29, 34, 35, and 38-45 are canceled without prejudice or disclaimer, and claims 5, 12, 16, 21, 27, and 32 are currently amended.   No new matter is introduced.

The Office Action mailed March 7, 2007 rejected claims 1-45 under 35 U.S.C. § 102 (b) as anticipated by *Sattar et al.* (US 5,243,643), and claims 1, 8, 15, 16, 21, 27, 32, 38, and 42 as anticipated by *Juster* (US 5,724,406) under 35 U.S.C. §102 (b).

REJECTIONS UNDER 35 U.S.C. §102 (b) BASED ON *SATTER ET AL.*

Claims 1, 8, and 15 call for the creation of "**a customer application file** using a customer-specified sequence of said service-independent building blocks in a server of said telecommunications network" and a "**set of customer specific data**" defined for use as inputs into the set of service-independent building blocks.

The Examiner asserts that the "customer application file" is the caller interface of *Sattar et al.* and that a teaching of "a set of customer specific data" may be found at col. 28, lines 18-60, of *Sattar et al.*   Applicants traverse.

While a user in *Sattar et al.* is permitted to change the branching sequences of vectors (e.g., col. 28, lines 23-24), akin to the claimed "defining a reusable set of service-independent building blocks" and "using a customer-specified sequence of said service-independent building blocks," contrary to the Examiner's suppositions, it does not appear that *Sattar et al.* teaches a separate **customer application file** and a **set of customer specific data** defined for use as inputs into the set of service-independent building blocks.

If the caller interface of *Sattar et al.* is regarded by the Examiner as the claimed "customer application file," it is unclear from the Examiner's explanation, at page 3 of the Office

Action, just what, in *Sattar et al.* is considered to be the claimed "set of customer specific data" defined for use as inputs into the set of service-independent building blocks. The section of *Sattar et al.* (col. 28, lines 18-60) relied on by the Examiner for this feature is directed to users being able to configure systems to meet specific application requirements by editing branch sequences of vectors. But such configurations are what changes the "call interface," the call interface configuration being contained in a "subscriber profile record" (e.g., lines 43-46 of col. 28). Each caller identification number allows access to a specific subscriber profile record, wherein interface configuration data is stored (col. 28, lines 58-60). However, Applicants can find nothing in the cited portion of *Sattar et al.* indicative of "wherein a set of customer specific data is defined for use as inputs into said set of service-independent building blocks," as claimed, and the Examiner has not particularly pointed to anything within *Sattar et al.* which teaches this claimed feature. If the Examiner has something specific in mind within the 43 lines of text cited for this feature, the Examiner is kindly requested to specifically identify what it is, in *Sattar et al.* that is alleged to teach "wherein a set of customer specific data is defined for use as inputs into said set of service-independent building blocks," as claimed. It clearly cannot be the caller interface of *Sattar et al.* because the Examiner has already identified this as the claimed "customer application file." The claims require both a "customer application file" (created by using a customer-specified sequence of service-independent building blocks), and "a set of customer-specific data" (defined for use as inputs into the set of service-independent building blocks). The Examiner has not shown where *Sattar et al* teaches **both** of these claimed features. As such, no *prima facie* case of anticipation has been established, and withdrawal of the rejection of claims 1, 8, and 15, as well as of claims 2-7, dependent on claim 1, and of claims 9-14, dependent on claim 8, under 35 U.S.C. § 102(b) over *Sattar et al.* is respectfully requested.

In any event, even assuming, *arguendo*, that *Sattar et al.* could be considered to teach both the "customer application file" and "a set of customer-specific data," as set forth in claims 1 and 8, *Sattar et al.* clearly lacks any teaching of executing the customer application file in accordance with the features of claims 7 and 14, viz., retrieving said customer application file using said application identification number; retrieving said customer specific data file from said advanced network database; and using said set of customer specific data in said customer specific data file as inputs into said sequence of said set of service-independent building blocks.

With regard to claim 7, the Examiner merely states that "Sattar teaches editing a customer application file (column 28, lines 18-39)" (Office Action-page 4). Clearly the Examiner has not presented a *prima facie* case of anticipation since the Examiner has not even addressed the limitations of claim 7, calling for specific steps in executing a customer application file, with those steps using both the customer application file and the customer specific data file. The Examiner's mere mention of "editing" of a customer application file cannot provide the requisite teaching of the specific execution steps of claim 7.

Regarding independent claims 16, 21, 27, and 32, as currently amended, claim 16, for example, now recite "wherein the customer application file is created according to a plurality of reusable, application independent software modules that receive customer specific data as inputs, the customer specific data being stored **as a file** in a database."

To the extent that the Examiner finds user inputs used to change branching sequences in *Sattar et al.* to be "customer specific data," there is no indication in *Sattar et al.* that such customer specific data is **stored** anywhere, and to the extent that the Examiner finds the database 60 in *Sattar et al.* to constitute such a storage, there is absolutely no indication in *Sattar et al.* that any such "customer specific data" is stored in database 60 **as a file**, as required by the claims. If the Examiner is considering the user input in *Sattar et al.* to be "stored" because the

changes in branching sequences of the vectors is saved as a configured caller interface, it is respectfully urged that the Examiner's rationale is faulty. First, while the new caller interface configurations (generated by user inputs) may be stored, the user inputs, *per se*, employed to generate these caller interface configurations are **not** saved. Second, to whatever extent there is a storage of anything at all in *Sattar et al.* relating to customer specific input data, any such "customer specific input data" used in forming the new caller interface configurations is **not** saved **as a file**, as claimed, and the Examiner has not shown that it is.

Accordingly, withdrawal of the anticipation rejection of claims 16, 21, 27, and 32, as well as of claims 17, 19, and 20, dependent on claim 16, of claims 22, 25, and 26, dependent on claim 21, of claims 28, 30, and 31, dependent on claim 27, and of claims 33, 36, and 37, dependent on claim 32, under 35 U.S.C. § 102(b) over *Sattar et al.* is respectfully requested.

With regard to the rejection of claims 38-45, these claims have now been canceled, obviating such rejection.

REJECTIONS UNDER 35 U.S.C. §102 (e) BASED ON *JUSTER*

Since claims 16, 21, 27, and 32 have been amended to include limitations of claims not rejected based on *Juster*, the rejection of these claims under 35 U.S.C. § 102(e) has been obviated and the Examiner should now withdraw the rejection of claims 16, 21, 27, and 32 under 35 U.S.C. § 102(e) based on *Juster*.

The rejection of claims 38 and 42 under 35 U.S.C. § 102(e) based on *Juster* is now moot in view of the cancellation of these claims.

Thus, the following remarks are directed to the rejection of claims 1, 8, and 15 under 35 U.S.C. § 102(e) based on *Juster*.

Claims 1, 8, and 15 call for the creation of "**a customer application file** using a customer-specified sequence of said service-independent building blocks in a server of said telecommunications network" and a "**set of customer specific data**" defined for use as inputs into the set of service-independent building blocks.

The Examiner asserts that the "customer application file" and "a set of customer specific data" may be found in the abstract and at col. 5, lines 54-57, col. 7, lines 29-40, and col. 11, lines 5-15 of *Juster.* Applicants respectfully traverse.
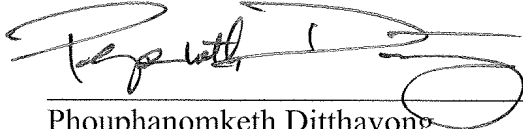
Applicants have reviewed the *Juster* reference, particularly the sections cited by the Examiner, and while *Juster* does concern user-specified sequences of call processing building blocks (e.g., col. 5, lines 12-57), Applicants find nothing in *Juster* concerning a "customer application file" which can be retrieved for execution by a node on a server. Moreover, the claims require both a "customer application file" (created by using a customer-specified sequence of service-independent building blocks), and "a set of customer-specific data" (defined for use as inputs into the set of service-independent building blocks). The Examiner has not shown where *Juster* teaches **both** of these claimed features. As such, no *prima facie* case of anticipation has been established, and withdrawal of the rejection of claims 1, 8, and 15 under 35 U.S.C. § 102(e) over *Juster* is respectfully requested.

Therefore, the present application, as amended, overcomes the rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (703) 519-9952 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

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5/23/07
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